

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA, Plaintiff, vs. RICARDO ALEXIS GONZALEZ- IBARRA, Defendant.	Cr. No. 1:25-cr-56 DEFENDANT'S MOTION TO CONTINUE TRIAL
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Comes now Ricardo Alexis Gonzalez-Ibarra, by and through his attorney, Assistant Federal Public Defender Rhiannon Gorham, and moves the Court for its Order extending the trial setting of June 3, 2025, as well as all related pretrial deadlines.

As grounds, Defendant states:

1. Defendant made his initial appearance and was arraigned on April 2, 2025, on an Indictment, charging the Defendant with Reentry of Deported Alien, in violation of 8 U.S.C. § 1326(a).
2. The Court entered its Criminal Pretrial Order and Jury Trial Notice on April 3, 2025, setting the jury trial for June 3, 2025.
3. Defendant received initial discovery from the government on April 3, 2025.
4. Defense counsel needs additional time to properly investigate this matter and prepare for trial. Additional investigative work, based on a review of the

discovery material, is necessary before defense counsel can competently advise the Defendant if a plea agreement or trial is in his best interests.

5. Defense counsel has advised the Defendant of this motion, its purpose, and constitutional and statutory right to a speedy trial, pursuant to 18 U.S.C. § 3161 et seq. Defendant said he would consent to a continuance and has executed a written consent form, which is being filed contemporaneously with this motion.

6. Defendant is currently detained at the Burleigh Morton Detention Center in Bismarck, North Dakota.

7. The Government, through Assistant United States Attorney David Rappenecker, does not object to this motion.

8. The undersigned, further, represents to the Court that this motion is made neither for purposes of undue delay nor other improper reason. Counsel makes this request for the Defendant in order to have the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

WHEREFORE, Defendant Ricardo Alexis Gonzalez-Ibarra, requests that the Court continue the trial setting to a time past June 3, 2025, and further, that all related pretrial deadlines be continued.

Dated this 15th day of May, 2025.

Respectfully submitted,

JASON J. TUPMAN
Federal Public Defender
By:

/s/ Rhiannon Gorham
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